

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS**

APACHE CORPORATION,

Plaintiff,

v.

MERIDIUM, INC.

Defendants.

Case No. 4:15-cv-01114

**UNOPPOSED MOTION TO RESCHEDULE INITIAL PRETRIAL
AND SCHEDULING CONFERENCE**

Defendant, Meridium, Inc. (“Meridium”) hereby files its Unopposed Motion to Reschedule Initial Pretrial and Scheduling Conference currently set for August 31, 2018, and states:

1. Pursuant to Docket No. 28, this Court ordered the parties to appear at an Initial Pretrial Scheduling Conference on August 31, 2018.

2. As ordered by the Court, counsel for Plaintiff Apache Corporation (“Apache”) and Meridium had already held their Rule 26 conference and are in process of completing their Joint Discovery and Case Management Plan for submission to the Court.

3. Lead counsel for Meridium, however, has a conflict with the August 31, 2018, conference date. Specifically, that is the Friday before the Labor Day Weekend, and Mr. Kunin is already scheduled with his spouse to fly from Atlanta, GA to Ft. Myers, FL for the Annual Florida Bar Business Law Section retreat. Mr. Kunin is on the Executive Council of the Section as its Out-of-State representative and is a sponsor of the retreat.

4. As a result, Meridium moves that the Initial Pretrial and Scheduling conference be rescheduled.

5. Counsel for Apache, Gabe T. Vick, has been consulted regarding this matter and does not oppose the relief sought.

WHEREFORE, Meridium respectfully requests that the Initial Pretrial and Scheduling Conference set for August 31, 2018, be rescheduled.

This 16th day of August 2018.

Respectfully submitted,

/s/Lawrence H. Kunin
Lawrence H. Kunin (Pro Hac Vice)
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Attorney-in-Charge for Meridium, Inc.

OF COUNSEL:

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ATTORNEYS FOR DEFENDANT MERIDIUM, INC.

CERTIFICATE OF SERVICE

I certify that on the 16th day of August, 2018, a true and correct copy of the foregoing instrument was served upon all counsel of record, pursuant to the Texas Rules of Civil Procedure, by electronic e-service as follows:

Gabe T. Vick
James J. Ormiston
Gray Reed & McGraw, LLP
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Attorney for Apache Corporation

/s/ Clifford L. Harrison
Clifford L. Harrison